

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

XYZ CORPORATION,

PLAINTIFF,

v.

THE PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED ON SCHEDULE A

DEFENDANTS.

CIVIL ACTION NO.: 1:20-cv-06426

**PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff, XYZ Corporation (“Plaintiff”), by its undersigned counsel, hereby files this Motion requesting leave to file the following documents under seal: (1) Exhibit 1 to the Complaint; (2) Exhibit 2 to the Complaint; (3) the Amended Complaint which will identify and include additional allegations regarding Plaintiff and Defendants; (4) Exhibit 3 - Schedule A to the Complaint, which includes a list of the Defendants by their online marketplace accounts (referred to as “Seller Aliases”) and their corresponding e-commerce store URLs; (5) Plaintiffs’ Motion for Entry of a Temporary Restraining Order, including a Temporary Injunction, a Temporary Asset Restraint, and Expedited Discovery, and accompanying supporting memorandum, declarations, and exhibits, including screenshot printouts showing the e-commerce stores operating under the Seller Aliases; and, (6) Plaintiffs’ Motion for Electronic Service of Process, and accompanying supporting memorandum, declaration, and exhibits.

In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for: trademark infringement and counterfeiting; false designation of origin, passing off and unfair competition; violation of the Illinois Uniform Deceptive Trade Practices Act; and copyright

infringement. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence as well as the hiding and/or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Dated: October 29, 2020

Respectfully submitted,

/s/ Ann Marie Sullivan  
Ann Marie Sullivan  
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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was electronically-filed on October 29, 2020, with the Clerk of the Court using the CM/ECF system, which will automatically send an email notification of such filing to all registered attorneys of record.

*/s/ Alison Carter*  
Alison Carter